

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA, )  
vs. ) Case No.: 17-cr-107(20) (DWF/TNL  
PLAINTIFF, )  
WARALEE WANLESS, )  
DEFENDANT. )

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**MOTION TO COMPEL DISCLOSURE OF THE EXISTENCE AND SUBSTANCE OF  
PROMISES OF IMMUNITY, LENIENCY, OR PREFERRED TREATMENT**

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COMES NOW the defendant, Waralee Wanless, by and through her counsel, and respectfully moves this Court for an Order compelling the government to produce, prior to trial, the following information:

- a. The existence, substance, and the manner of execution of fulfillment of any promise, statement, agreement, understanding or arrangement, either verbal, written or implied between the government or its agents and any prosecution witness or cooperating individual, or such person's attorneys or representatives, for the purpose of obtaining said person's testimony or cooperation, or the disclosure of information by ther person to the government or its agents, wherein the government or any of its agents has agreed to do or has suggested it would do any of the following:
  1. Not to prosecute said person for any crime or crimes or recommend that the person not be prosecuted for any past or futrure criminal conduct;
  2. Not to prosecute a third party for any crime or crimes where the reason for not prosecuting the third pary is a consideration to the person;
  3. To provide a formal grant of statutory immunity or to provide an informal

assurance that the person will not be prosecuted in connection with any testimony, cooperation, or information given by him or her;

4. To recommend leniency or a particular sentence for any crime or crimes for which he or she stands convicted or is expected to be convicted;
5. To comply with any prior agreements although said witness may have previously violated a part of his or her agreement;
6. To provide favorable treatment or consideration, including by not limited to, money, a job, a new location, a new start, etc., to the person or to friends or relatives of the person in return for his or her testimony or cooperation, and/or providing information;
7. To make any recommendations of benefit to the person to any state or federal agency including, but not limited to, any state or federal law enforcement agency;
8. To cooperate with any state law enforcement agency in that agency's agreement not to prosecute said person for any crime or crimes prohibited by state law; and
9. To make any other recommendation of benefit, or give any other consideration to the person or friends or relatives of said person.
  - b. Any canceled checks, receipts, vouchers, or any other document produced as a result of any promise, statement, agreement, understanding or arrangement by which any of the above was provided to the person or by which record was kept of such by the government.
  - c. The substance and manner of what might arguably be characterized as a possible threat of prosecution or intimidation of any kind by any government agency or other person acting on behalf of the government to a witness concerning the giving or not giving of any testimony, cooperation, or information in this case.
  - d. The existence, substance and manner of execution of any of the above matters relative to any and all individuals.

Respectfully submitted,

RIVERS LAW FIRM, P.A..

Dated: 1/26/2018

By: Bruce Rivers

Bruce Rivers

Attorney I.D. No. 282698

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